

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ZOHO CORPORATION,

Plaintiff,

v.

LIBERTY PEAK VENTURES, LLC,

Defendant.

Civil Action No. 1:22-cv-37-LY

LIBERTY PEAK VENTURES, LLC,

Counterclaimant,

v.

ZOHO CORPORATION,

Counter-Defendant,

and

ZOHO CORPORATION PVT. LTD.

Third-Party Defendant.

**DECLARATION OF RYAN J. MARTON IN SUPPORT OF
ZOHO’S SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF**

I, Ryan J. Marton, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am a partner with the law firm of Marton Ribera Schumann & Chang LLP, counsel for Plaintiff and Counter-defendant Zoho Corporation and Third-Party Defendant Zoho Corporation Pvt. Ltd. (“Zoho”) in this matter. I submit this declaration in support of Zoho’s Supplemental Claim

Construction brief. I have personal knowledge of the facts set forth herein unless otherwise indicated, and if called to testify, I could and would testify competently thereto.

2. On February 20, 2023, I took the deposition of Liberty Peak's expert, Dr. Melendez. Attached hereto as Exhibit A are true and correct copies of excerpts of the transcripts from that deposition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed this 6th day of March 2023 in San Francisco, CA.

/s Ryan J. Marton
Ryan J. Marton